

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

Autoscribe Corporation

Plaintiff,

v.

Paysafe Limited,
Paysafe Holdings (US) Corp.,
Paysafe Merchant Services Corp., and
Paysafe Payment Processing Solutions LLC

Defendants.

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Case No. 3:24-cv-00104

JURY TRIAL DEMANDED

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO MOVE, ANSWER OR
OTHERWISE RESPOND TO PLAINTIFF’S COMPLAINT, AND WAIVER OF
FOREIGN SERVICE REQUIREMENT**

Defendants Paysafe Limited, Paysafe Holdings (US) Corp., Paysafe Merchant Services Corp., and Paysafe Payment Processing Solutions LLC (collectively, “Paysafe Defendants”) move the Court to extend the time within which the Paysafe Defendants are required to move, answer or otherwise respond to Plaintiff’s Complaint. In so doing, the Paysafe Defendants would not waive any defenses, including but not limited to those described or referred to in Rule 12 F.R.C.P. In support of this Motion, the Paysafe Defendants state as follows:

1. On April 11, 2023, Plaintiff Autoscribe Corporation filed its Complaint alleging patent infringement against the Paysafe Defendants.

2. On April 25, 2024, Defendants Paysafe Holdings (US) Corp., Paysafe Merchant Services Corp., and Paysafe Payment Processing Solutions LLC were served with Plaintiff’s Complaint. Paysafe Limited, a foreign entity, has not yet been served.

3. Counsel for Defendants has agreed to waive service under the Hague Convention for Paysafe Limited, a foreign entity, in exchange for a 90-day extension of time for all defendants to answer or otherwise plead by July 25, 2024.

4. Defendants' agreement with Plaintiff should not be construed as a waiver of any other rights or defenses, including, for instance, Defendants' right to file counterclaims, affirmative defenses, or to otherwise challenge the validity of the subject patents.

WHEREFORE, the Paysafe Defendants respectfully request that the time in which the Paysafe Defendants are required to move, answer or otherwise respond to Plaintiff's Complaint be extended to and include July 25, 2024.

Dated: May 1, 2024

Respectfully submitted,

By: /s/ Jon B. Hyland
Jon B. Hyland
(Southern District Bar No. 1145969)
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Counsel for Defendants

CERTIFICATE OF CONFERENCE

This is to certify that on April 29, 2024, counsel for Defendants conferred via phone with counsel for Plaintiff regarding this motion. During the conference, counsel for Plaintiff stated that this motion is **unopposed**.

/s/ Jon B. Hyland

CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic services are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this the 1st day of May, 2024.

s/ Jon B. Hyland

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Case No. 3:24-cv-00104

JURY TRIAL DEMANDED

**ORDER GRANTING UNOPPOSED MOTION FOR EXTENSION OF TIME TO MOVE,
ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT AND
WAIVER OF FOREIGN SERVICE REQUIREMENT**

Before the Court is Paysafe Limited, Paysafe Holdings (US) Corp., Paysafe Merchant Services Corp., and Paysafe Payment Processing Solutions LLC's Unopposed Motion for Extension of Time to Move, Answer, or Otherwise Respond to Plaintiff's Complaint and Waiver of Foreign Service Requirement. After considering same, the Court is of the opinion that the Motion should be GRANTED.

IT IS ORDERED that the deadline for Defendants Paysafe Limited, Paysafe Holdings (US) Corp., Paysafe Merchant Services Corp., and Paysafe Payment Processing Solutions LLC to answer or otherwise respond to Plaintiff's Complaint is hereby extended up to and including August 14, 2024. IT IS FURTHER ORDERED that service of process for Paysafe Limited has been waived.